

ID: CCA-818110-08

Number: **200848066**

Office:

Release Date: 11/28/2008

UILC: 6229.02-00

From:

Sent: Mon 8/18/2008 11:04 AM

To:

Cc:

Subject: RE: TEFRA Question - please see if you agree with my analysis

The Form 872-P for A will keep the statute open for the taxability of any distribution to C and C's treatment of such items on its balance sheet. The A proceeding will determine C's share of liabilities, contributions to A and A distributions to C, and any carryover basis in distributed property. We would need to issue an affected item PEA to C after the conclusion of the A proceeding (within the one year period).